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Attorneys for McKinsey Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: MCKINSEY & CO., INC. NATIONAL
PRESCRIPTION OPIATE CONSULTANT
LITIGATION

This Document Relates to:

All School District Cases
All Subdivision Cases
All Third Party Payor Cases
All Tribal Cases

Case No. 3:21-md-02996-CRB

**STIPULATION AND [PROPOSED]
SETTLEMENT APPROVAL SCHEDULE
AND NOTICE PROCESSES**

Judge: Charles R. Breyer

Pursuant to the Joint Status Report (ECF No. 562), the Parties propose this Settlement Approval Schedule and Notice Processes for the School District, Subdivision, Tribal, and Third Party Payor (TPP) Plaintiffs.

For the School District, Subdivision, and Third Party Payor Plaintiffs:

For the School District and Subdivision proposed class action settlements, the parties to each are drafting settlement agreements, class notices, and notice programs, and will file their respective motions for preliminary approval under Rule 23(e) no later than August 31, 2023, with hearing thereon to be set by the Court.

For the TPP proposed class action settlement, TPP plaintiffs are drafting the settlement agreement, class notice, and notice program, and will file their motion for preliminary approval under Rule 23(e) no later than September 15, 2023, with the hearing thereon to be set by the Court.

These dates may be reasonably extended by the parties if necessary to finalize the settlements, with notice to the Court of any such extensions.

For Tribal Plaintiffs:

The Tribal settlement is a non-class, opt-in settlement that generally follows the process developed in the previous Tribal settlements in MDL 2804. The Tribal settlement agreement and participation forms are being finalized, and the participation process is expected to commence shortly. The parties will provide further information on the progress of this settlement by August 31, 2023.

Respectfully submitted,

Dated: July 27, 2023

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
ELIZABETH J. CABRASER

By: /s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser

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